

Message

---

**From:** Healy, Stephen [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D1638B0A30364C7D98EA7AF410A9CB2A-HEALY, STEPHEN]  
**Sent:** 6/27/2014 5:59:03 PM  
**To:** christian.denton@alexander-dennis.com  
**CC:** Orehowsky, Gregory [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=48a0e3aeda42426280f28b57447bdbf6-GOREHOWS]  
**Subject:** RE: 2014 GHG Heavy-Duty Vehicle Certification  
**Attachments:** hd-ghg-tractor-vv-workshop.pdf

Christian,

Alexander Dennis Ltd would not qualify as a small business and therefore these buses would be required to certify to requirements of 40 CFR 1037. You are correct that these buses would be categorized as "vocational vehicles". I have attached a presentation which outlines the heavy-duty greenhouse gas certification program. Please review this and then we can set up a conference call to discuss the certification process. Let me know if you have further questions.

Stephen Healy  
Mechanical Engineer  
EPA OTAQ Compliance Division  
Diesel Engine Compliance Center  
734--214-4121

---

**From:** Orehowsky, Gregory  
**Sent:** Friday, June 27, 2014 8:54 AM  
**To:** Healy, Stephen  
**Cc:** Gumbs, Jason; christian.denton@alexander-dennis.com  
**Subject:** RE: 2014 GHG Heavy-Duty Vehicle Certification

Steve:

A question about HD GHG

Greg Orehowsky  
Compliance Division  
Office of Transportation and Air Quality  
U.S. EPA  
Phone 202-343-9292

---

**From:** christian.denton@alexander-dennis.com [mailto:christian.denton@alexander-dennis.com]  
**Sent:** Friday, June 27, 2014 7:10 AM  
**To:** Smith, Jay  
**Cc:** Gumbs, Jason; Orehowsky, Gregory  
**Subject:** 2014 GHG Heavy-Duty Vehicle Certification  
**Importance:** High

Dear Mr Jay Smith,

My name is Christian Denton, I work at a small bus and coach manufacturer called Alexander Dennis. We manufacture coaches for the United Kingdom and buses for the United Kingdom, the United States of America, Canada, Hong Kong, Singapore, Malaysia, Australia and New Zealand. I work in the Homologation Department and, hence, we are responsible

for the application of the vehicle legislation and the certification of our products. I obtained your contact details from the Environmental Protection Agency website. I have copied in your colleagues as I was not absolutely sure that you would be the correct contact.

We have been manufacturing buses for the United States of America for over decade now and, over this time, we have always fitted Cummins heavy-duty diesel engines. We currently offer two products to the market, a GVWR ~40,000lb two axle double deck called "Enviro 400" and a GVWR ~50,000lb three axle double deck called "Enviro 500". All of these products are compliant with the applicable EPA, FMVSS and FMCSA legislative requirements. There are, in fact, a small batch of Enviro 500 that we sold in 2007 operating in Washington DC operated by a company called Les Cars Rouges (image attached for you).

# CBI / Ex. 4

I am writing to kindly ask you two questions:

1. We note that CFR 40 Part 1037 allows exemption to the requirements for "small manufacturers". The definition it offers is, "means a manufacturer meeting the criteria specified in 13 CFR 121.201. For manufacturers owned by a parent company, the employee and revenue limits apply to the total number employees and total revenue of the parent company and all its subsidiaries". In 13 CFR 121.201 under category 336390 is "Other Motor Vehicle" and it allows up to 750 employees. Whilst Alexander Dennis exceeds this number of employees worldwide, the number of employees in the United States of America is but a handful. The number of employees allocated to procurement, design and build of vehicles for the United States of America is also much less than 750 people. Please can you let us know if we are able to apply for an exemption and, if so, what other details you require about our business operations and/or our products.
2. If you do not believe that we are exempt from these requirements, we need to certify our 7 buses. I believe that, as double-deck buses, they are "vocational vehicles" and thus the carbon dioxide requirements are applicable to them. Please can you let us know what we need to do to certify these products?

We look forward to your response.

Kind Regards and have an great weekend,

Christian.

Christian Denton.  
Chassis Homologation Manager.  
Alexander Dennis Limited.  
+44 +1483 887275

Disclaimer - This email and any files transmitted with it are confidential and contain privileged or copyright information. You must not present this message to another party without gaining permission from the sender. If you have received this message in error, please notify the sender immediately, and delete this email from your system. We do not guarantee that this material is free from viruses or any other defects although due care has been taken to minimise the risk. ADL's Terms and Conditions of Purchase and Sale apply to all orders for goods and/or services purchased or sold by ADL unless expressly agreed by us in writing. Alexander Dennis Ltd Registered in Scotland Company Reg. No: SC268016 Registered Office: 16 Charlotte Square, Edinburgh EH2 4DF